CENTRAL DISTRICT OF CALIFORNIA

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B. THE SCHEME TO DEFRAUD

2. Beginning on a date unknown to the Grand Jury, but no later than on or about February 15, 2023, and continuing to at least March 2, 2023, in Los Angeles and Orange Counties, within the Central

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

March 2024 Grand Jury

No. 8:24-cr-00034-JVS

I N D I C T M E N T

[18 U.S.C. § 1344(1): Bank Fraud; 18 U.S.C. § 1029(a)(1): Use of Counterfeit Access Device; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft]

The Grand Jury charges:

UNITED STATES OF AMERICA,

v.

RODNEY LEE TAYLOR,

Plaintiff,

Defendant.

COUNTS ONE THROUGH THREE

[18 U.S.C. § 1344(1)]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Capital One was a financial institution insured by the Federal Deposit Insurance Corporation.

District of California, and elsewhere, defendant RODNEY LEE TAYLOR, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud Capital One.

- 3. The scheme to defraud operated, in substance, in the following manner:
- a. Defendant TAYLOR would obtain personal identifying information of victims and information related to actual credit cards held by the victims.
- b. Defendant TAYLOR then would make telephone calls to the financial institutions that issued these credit cards to the victims, would impersonate the victims during the calls, and, while fraudulently claiming to be the victims, would instruct the financial institutions to issue an additional credit card on the victims' accounts in defendant TAYLOR's own name and send those cards to defendant TAYLOR.
- c. The financial institutions would then create new credit cards on the victims' accounts in defendant TAYLOR's name and send those cards to defendant TAYLOR.
- d. Defendant TAYLOR would then use the fraudulently issued credit cards to purchase expensive merchandise at luxury retail stores.

C. EXECUTION OF THE SCHEME TO DEFRAUD

4. On or about the dates set forth below, in Orange County, within in the Central District of California, and elsewhere, defendant TAYLOR knowingly and willfully executed the fraudulent scheme described above by committing the following acts:

COUNT	DATE	ACT
ONE	2/28/2023	Purchase of merchandise in the amount of \$8,124.36 with Capital One Neiman Marcus credit card with number ending in 1336 issued on account of I.B.
TWO	2/28/2023	Purchase of merchandise in the amount of \$11,626.22 with Capital One Neiman Marcus credit card with number ending in 1336 issued on account of I.B.
THREE	3/2/2023	Purchase of merchandise in the amount of \$2,920.03 with Capital One Neiman Marcus credit card with number ending in 1336 issued on account of I.B.

COUNT FOUR

[18 U.S.C. § 1029(a)(1)]

On or about February 28, 2023, in Orange County, within the Central District of California, defendant RODNEY LEE TAYLOR, knowingly and with intent to defraud, used a counterfeit access device (as defined in Title 18, United States Code, Sections 1029(e)(1) and (2)), namely, a fraudulently obtained Capital One Neiman Marcus credit card with number ending in 1336, to purchase merchandise in the amount of \$8,124.36, with such use affecting interstate and foreign commerce.

COUNT FIVE

[18 U.S.C. § 1029(a)(1)]

On or about February 28, 2023, in Orange County, within the Central District of California, defendant RODNEY LEE TAYLOR, knowingly and with intent to defraud, used a counterfeit access device (as defined in Title 18, United States Code, Sections 1029(e)(1) and (2)), namely, a fraudulently obtained Capital One Neiman Marcus credit card with number ending in 1336, to purchase merchandise in the amount of \$11,626.22, with such use affecting interstate and foreign commerce.

COUNT SIX

2 [18 U.S.C. § 1029(a)(1)]

On or about March 2, 2023, in Orange County, within the Central District of California, defendant RODNEY LEE TAYLOR, knowingly and with intent to defraud, used a counterfeit access device (as defined in Title 18, United States Code, Sections 1029(e)(1) and (2)), namely, a fraudulently obtained Capital One Neiman Marcus credit card with number ending in 1336, to purchase merchandise in a transaction in the amount of \$2,920.03, with such use affecting interstate and foreign commerce.

COUNT SEVEN 1 [18 U.S.C. \S 1028A(a)(1)] 2 3 From on or about February 15, 2023 to on or about March 2, 2023, in Los Angeles and Orange Counties, within the Central District of 4 5 California, defendant RODNEY LEE TAYLOR knowingly used and possessed, without lawful authority, means of identification that defendant 6 7 TAYLOR knew belonged to another person, namely, the name, partial 8 Social Security number, email address, and telephone number of I.B., 9 during and in relation to the offenses of Bank Fraud, felony violations of Title 18, United States Code, Section 1344(1), as 10 11 charged in Counts One through Three of this Indictment. 12 A TRUE BILL 13 14 /s/ 15 Foreperson 16 17 E. MARTIN ESTRADA United States Attorney 18 19 20 MACK E. JENKINS Assistant United States Attorney 21 Chief, Criminal Division 22 BENJAMIN R. BARRON Assistant United States Attorney 23 Chief, Santa Ana Branch Office 24 LAWRENCE E. KOLE Assistant United States Attorney 25 Santa Ana Branch Office 26 27